

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Powell:

My name is Howard Brooks and I am the President of Iamnow.net, in Bradford, NH. We began business in 1997 and presently have 600 customers, most of whom live and work in Bradford but we also do a fair amount of web hosting for customers throughout the area.

We offer many services that our local phone company, MCTel, does not. Services like free Internet training and setup for new sign-ups in their homes, free virus and eMail filtering, and a local server to do shareware downloads. We also helped our local Community Center get online, even before and without the e-rate. My customers continue to be thrilled with our care and service. We offer Nationwide Access for our snow-birds and traveling users.

MCTel offers no such services to their customers. Our rate plans are more diverse and less expensive.

When we opened for business we started, as many ISPs did, with a stack of ordinary dial-up modems and a fistful of phone lines from MCTel and a deep concern for the common good.

Nowadays we have moved on from ordinary phone lines to digital PRI's (Primary Rate ISDN), and if a second CLEC came to town, I'd move all of the business we could over to that company instead. We are stuck with a PRI rate of around \$42 per line per month from MCTel. This rate was increased from \$20 per month last October. By the way, MCTel owns our only local competitor, Conknet.

Unfortunately, I can't say the same about DSL, regardless of the price. It is just too expensive and without profit margin. If we want to offer Internet access over DSL to our customers, we must do it through MCTel, and the prices MCTel has offered us makes it impossible for us to compete. We are expected to pay \$37 per month for the data line to reach the customer, buy a C3 line for \$1250 per month, and turn around and compete with MCTel, which is offering reconfigured phone lines, internet access for \$50 per month. There is no way we can offer this product without losing money, and so we have stayed out of the DSL market except for 3 lines that we built ourselves over BANA circuits that I have to sell for \$70 per month and we do not make any profit for at least a year. And I am told that the BANA circuit is going up in price as well. Unfortunately this also means that we are losing customers, either to MCTel for DSL or to the cable company, since more and more of our customers are demanding faster access and if we can't provide it, they'll go to someone who will. If that trend continues, IamNow.net will not be around much longer. In addition, MCTel has just been sold to TDS Telephone Company because after 100 years of service to the local community they are financially strapped. But so what, the largest neighboring telephone company in the country, Verizon, is also losing money. Something is drastically wrong and higher rates is not the answer..

I do not have the resources to fight the tariff that MCTel has filed that allows it to get away with charging ISPs a wholesale rate of \$37 for access to the network. I believe the true cost is probably a great deal less than that. However, I also do not believe that the answer to this problem is simply to allow MCTel to stop selling access to the network at all, or to take away the requirements that are supposed to be preventing MCTel from discriminating.

The answer is for the FCC to make a good faith effort to uncover the discrimi-

mination (whether it is in pricing or provisioning) and put an end to it. Until the FCC has demonstrated that it is willing to do this for ISPs, any talk about lifting the rules for pure monopolies like MCTel is premature. I hope that you will take my comments seriously - I am sending a copy of this letter to my Congressman as well.

Sincerely,

Howard A. Brooks
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Bradford, NH 03221